

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**SARA VACCARO,**

Petitioner,

CASE NO.

v.

**FACEBOOK INC. d/b/a INSTAGRAM**

Respondent.

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C. Christopher Newberg (P79025)  
RODENHOUSE LAW GROUP P.C.  
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**REQUEST TO THE CLERK FOR ISSUANCE OF SUBPOENA PURSUANT TO 17  
U.S.C. § 512(H)**

Petitioner, Sara Vaccaro, by and through her undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Facebook Inc. d/b/a Instagram to identify alleged infringer(s) at issue, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”). The proposed DMCA Subpoena is attached hereto as **Exhibit 1.**

The DMCA Subpoena is directed to Facebook Inc. d/b/a Instagram, the internet service provider to which an unidentified user posted content that infringes on copyrights held by Petitioner to an Instagram account identified as “vaccarosara81.”

Petitioner has satisfied the requirements for the issuance of a subpoena pursuant to 17 U.S.C. § 512(h) by submitting the following documents with this request:

1. The proposed DMCA Subpoena (with cover letter), attached as **Exhibit 1**;
2. A copy of the notification described by 17 U.S.C. § 512(c)(3)(A), attached as **Exhibit 2**; and
3. A sworn declaration to the effect that the purpose for which the subpoena is sought is to obtain the identity of an alleged infringer and that such information will only be used for the purpose of protecting rights under the DMCA, attached as **Exhibit 3**.

Because Petitioner has complied with the statutory requirements, Petitioner respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena, pursuant to 17 U.S.C. 512(h)(4).

Respectfully submitted,

RODENHOUSE LAW GROUP, P.C.

Date: September 25, 2020

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